



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP
F. #2021R00600

271 Cadman Plaza East
Brooklyn, New York 11201

December 31, 2024

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By Email and ECF

Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were obtained by the government during the course of the investigation:

Bates No.	Description of Item
EDNY_046322-EDNY_046679	Records from Flagstar Bank, formerly known as Signature Bank, previously produced as EDNY_009092-EDNY_009491

Bates No.	Description of Item
EDNY_046680-EDNY_048594; EDNY_049785-EDNY_049948	Supplemental Records from Flagstar Bank, formerly known as Signature Bank
EDNY_049595- EDNY_049601	Body Camera Footage
EDNY_049602-EDNY_049608	Selected Surveillance Footage from the Entity Identified in the Indictment as the “Wine Store,” as well as an associated Report
EDNY_049609-EDNY_049704	Financial Records Associated with the Entity Identified in the Indictment as the “Wine Store”
EDNY_049705-EDNY_049705	Name List
EDNY_049706-EDNY_049755	Selected Travel Records
EDNY_049756-EDNY_049763	DMV Records
EDNY_049764-EDNY_049784	Draft Translation of Chat Messages Between Linda Sun and Family Members
EDNY_049949-EDNY_049968	Open Source Records

In addition, please find the following materials produced in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which are contained on encrypted hard drives produced separately to counsel for the respective defendant.

Bates No.	Description of Item
EDNY_049969	Responsive Report for one silver Macbook Pro, serial number [REDACTED], that was seized at the Sun and Hu Residence
EDNY_049970	Responsive Reports for one blue- and white-colored USB and one white-colored, 32G USB with “China import and export fair” label, that were seized at the Sun and Hu Residence

Bates No.	Description of Item
EDNY_049971	Responsive Reports for one red- and black-colored SanDisk USB with "CHRIS" label that was seized at the Sun and Hu Residence
EDNY_049972	Responsive Reports for one 16 GB silver-colored Lexar USB that was seized at the Sun and Hu Residence
EDNY_049973	Forensic images of one Dell Optiplex 3090, service tag [REDACTED] and one Dell Optiplex 3090, serial number [REDACTED], that were seized at the Entity Identified in the Indictment as the "Wine Store"
EDNY_049974	Responsive Reports of one Dell Optiplex 3090, service tag [REDACTED], and one Dell Optiplex 3090, serial number [REDACTED], that were seized at the Entity Identified in the Indictment as the "Wine Store"
EDNY_049975	Responsive Reports for an Electronic Devices of the Person Identified in the Indictment as "CC-1"

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Alexander A. Solomon
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cc: Clerk of the Court (BMC) (by ECF) (without download link)